



Federal Regulatory Affairs

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March 15, 2011

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, D.C. 20554

Re: *Implementation of Section 224 of the Act*, WC Dkt. No. 07-245; *A National Broadband Plan for Our Future*, GN Docket No. 09-51

Dear Ms. Dortch:

On March 14, 2011, Kathleen Abernathy, Chief Legal Officer and Executive Vice President, Regulatory and Government Affairs for Frontier Communications spoke by phone with Commissioner Meredith Attwell Baker and Brad Gillen, Legal Advisor—Wireline Issues to Commissioner Baker, regarding the above-referenced proceedings.

Ms. Abernathy explained that the traditional balance presumed for pole attachment joint use agreements between ILECs and utilities is no longer applicable as utilities now control a significantly higher percentage of poles than ILECs. Because there is no longer parity in the relationship, utilities have gained significant leverage in joint use agreements that they have used to dramatically increase the pole attachment rates for ILECs. These increased rates for pole attachments make it even more difficult for ILECs to deploy and operate broadband networks in rural areas, and place ILECs at a competitive disadvantage to cable companies and CLECs in the broadband marketplace. Ms. Abernathy urged the Commission to correct the competitive inequities in pole attachment rates by ensuring that rates for all broadband attachers are uniformly low, in line with the goals of the National Broadband Plan. The attached presentation illustrates these points.

Please feel free to contact me with any further questions.

Sincerely,

/s/

Michael D. Saperstein, Jr.  
Director of Federal Regulatory Affairs  
Frontier Communications  
(203) 614-4702

Cc: Commissioner Baker  
Brad Gillen